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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case No. 19-30088 (DM)

PG&E CORPORATION,

Chapter 11

- and -

(Lead Case) (Jointly Administered)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO TWENTY-FOURTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (NO LOSS CAUSATION -
SECURITIES SOLD PRIOR TO THE FIRST
PURPORTED "CORRECTIVE
DISCLOSURE") AND REQUEST FOR
ORDER BY DEFAULT AS TO UNOPPOSED
OBJECTIONS**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

[Re: Dkt. No. 13963]

**Resolving Objections Set for Hearing
September 26, 2023 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Twenty-Fourth Securities Claims*
9 *Omnibus Objection (No Loss Causation—Securities Sold Prior to the First Purported “Corrective*
10 *Disclosure”)* [Docket No. 13963] (the “**Twenty-Fourth Securities Claims Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE**
12 **TWENTY-FOURTH SECURITIES CLAIMS OMNIBUS OBJECTION**

13 The Twenty-Fourth Securities Claims Omnibus Objection seeks to disallow and expunge proofs
14 of claim listed in **Exhibit 1** to that Objection, on the grounds that the holders of those claims sold all of
15 their positions prior to the release of any purported “corrective disclosure.”

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Twenty-Fourth*
18 *Securities Claims Omnibus Objection (No Loss Causation – Securities Sold Prior to the First Purported*
19 *“Corrective Disclosure”)* [Docket No. 13965] (the “**Notice of Hearing**”). The Twenty-Fourth
20 Securities Claims Omnibus Objection was supported by the *Declaration of Angela Ferrante in Support*
21 *of Reorganized Debtors’ Twenty-Fourth Securities Claims Omnibus Objection (No Loss Causation –*
22 *Securities Sold Prior to the First Purported “Corrective Disclosure”)* [Docket No. 13964] (the
23 “**Ferrante Declaration**”). The Twenty-Fourth Securities Claims Omnibus Objection, the Notice of
24 Hearing, and the Ferrante Declaration were served as described in the *Certificate of Service* of Liz
25 Santodomingo, filed on August 28, 2023 [Docket No. 13997] (the “**Certificate of Service**”). As further
26 described in the Certificate of Service, on August 15, 2023, each holder of a claim listed on **Exhibit 1**
27 to the Twenty-Fourth Securities Claims Omnibus Objection received a notice including the claim
28

1 number, debtor, claim amount, and the basis for the Reorganized Debtors' objection with respect to the
2 applicable claim to be disallowed and expunged.

3 The deadline to file responses or oppositions to the Twenty-Fourth Securities Claims Omnibus
4 Objection has passed. The Reorganized Debtors have not received any formal or informal responses.

5
6 **DECLARATION OF NO OPPOSITION RECEIVED**

7 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

8 1. I am a member of the law firm of Weil, Gotshal & Manges LLP ("Weil"), counsel for
9 the Reorganized Debtors.

10 2. The Court's docket in the Chapter 11 Cases has been reviewed and Weil has determined
11 that no responses have been filed with respect to the Twenty-Fourth Securities Claims Omnibus
12 Objection.

13 WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and
14 expunging the proofs of claim listed in the column headed "Claims to be Disallowed and Expunged" in
15 **Exhibit A** to this Request, which lists claims identical to those in **Exhibit 1** to the Twenty-Fourth
16 Securities Claims Omnibus Objection.

17 Dated September 22, 2023

18 **WEIL, GOTSHAL & MANGES LLP**

19 **KELLER BENVENUTTI KIM LLP**

20 By: /s/ Richard W. Slack

21 Richard W. Slack

22 *Attorneys for Debtors and Reorganized Debtors*
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